

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF OHIO
3 WESTERN DIVISION

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5 TERESA READNOWER,)
6 Plaintiff,)
7 vs.) Civil Action
8 GENERAL IONICS, INC.,) No. C-1-01-654
9 Defendant.) J. Weber

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11 DEPOSITION OF JULIE SEGER
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1 T. Readnower - by Ms. Clark

2 Q. It didn't apply?

3 A. There was no conversation regarding
4 FMLA. It didn't apply to the conversation.
5 Ms. Readnower was not on FMLA Leave at the
6 time.

7 (Seeger's Exhibit No. 5 was marked
8 for identification.)

9 Q. Ms. Seeger, take the time you need,
10 if you would, to look this document over.

11 A. Okay.

12 Q. Could you turn to the paragraph
13 numbered 14, please.

14 A. Okay.

15 Q. Did you decide to terminate
16 Ms. Readnower's employment?

17 A. I made a recommendation.

18 Q. You made a recommendation to whom?

19 A. To Marianne Manzon-Winsser,
20 coordinated with corporate counsel.

21 Q. Can you explain to me why -- I'm a
22 little confused because I see here language to
23 the effect that I decided that Ms. Readnower's
24 behavior are the factors -- based on those
25 other factors, Ionics had no choice to

1 T. Readnower - by Ms. Clark

2 terminate her employment and then down below,
3 this decision was made with the approval of
4 several people. Are you saying it was actually
5 just a recommendation?

6 A. I don't have the opportunity to
7 terminate employees at Ionics, Incorporated.
8 That was handled at the corporate level. So it
9 was a recommendation, based on my understanding
10 of what was going on.

11 Q. When you made the recommendation
12 to -- when you discussed this potential
13 termination with Marianne Manzon-Winsser and/or
14 Dave McKinley, was there any discussion about
15 whether you were proceeding under termination
16 for cause versus termination for performance
17 reasons?

18 A. No. If you are asking specifically
19 related to the policy, no. I mean, the
20 discussion was about the termination and the
21 reasons for termination, but it wasn't
22 presented in the format of the category does
23 this apply to you.

24 Q. Did anybody ask your opinion on
25 whether Ms. Readnower had received notice of

121

1 T. Readnower - by Ms. Clark

2 Q. Did this conversation occur -- was
3 this conversation relevant to your
4 recommendation to terminate Ms. Readnower?

5 A. This conversation occurred, I
6 believe, because Jennifer was named as a
7 witness in an EEOC complaint, and it had not
8 been relevant before that, meaning we had no
9 reason to ask her any questions before that.

10 Q. Was the conversation relevant to
11 your recommendation to recommend termination?

12 A. The decision only in terms if she
13 had said something that was not in line with
14 everything else that someone -- if some major
15 revelation came out of the conversation, it
16 would have had an impact. The decision was
17 already made.

18 Q. When was the decision made?

19 A. The decision was made -- the
20 conversation happened some time, I believe, in
21 December, following the interviews with the
22 telemarketers between myself and legal counsel
23 and Marianne. It would have followed the
24 interviews with the telemarketers.

25 Q. So the decision to terminate was

1 T. Readnower - by Ms. Clark

2 made in December?

3 A. Yes.

4 Q. Were there steps in the process
5 towards termination?

6 A. Steps in terms of gathering all of
7 the information, presenting it, making a
8 determination what the next step would be if
9 there was a next step or if there was enough
10 information to make a decision, those steps.

11 Q. Tell me what happened after the last
12 interview with the telemarketers?

13 A. After interviewing the
14 telemarketers -- first of all, we knew that
15 telemarketers were suggesting that Teresa had
16 been involved in the incidents, the drinking
17 incidents prior to talking to the
18 telemarketers. That had come to light through
19 Dan. Talking to the telemarketers was to
20 verify that that was true, that telemarketers
21 were stating this about -- that the description
22 of the incidents were accurate. There was a
23 conversation with counsel prior to talking to
24 the telemarketers about, you know, we've got a
25 supervisor who is being said to have been in

123

1 T. Readnower - by Ms. Clark

2 this circumstance. This is totally not
3 something that we support in the workplace. It
4 is something that is, you know, obviously is a
5 serious, serious issue for a supervisor to have
6 participated in such things and written up her
7 employees and denied knowledge of it to her
8 supervisor, a serious issue, and that's where
9 the telemarketing investigation came from. The
10 conversations with the telemarketers were
11 related to finding out whether that issue was
12 true. So there was some conversation ahead of
13 time about what do we do with this knowledge
14 that we have of a couple of people who have
15 said to Dan here's what happened. Teresa was
16 involved, and the attorneys, we talked about it
17 and said let's gather the additional
18 information and just verify that it's true. So
19 there was a discussion about the fact that
20 there were grounds for termination in the
21 performance of the supervisor, and consequently
22 we did the investigation, found out additional
23 information about morale in the workplace,
24 about employees and how they were treated in
25 the workplace, and so it was a follow-up

124

1 T. Readnower - by Ms. Clark

2 conversation then with the attorney that here's
3 what happened. Here's the information and
4 that's when the conversation took place,
5 following -- at some point following the
6 investigation with the telemarketers. Once the
7 information was gathered, it was submitted for
8 review.

9 Q. When was the decision made? Was the
10 decision made to terminate before the first of
11 the year?

12 A. Yes.

13 Q. Were you privy to the conversation
14 in which that determination was made?

15 A. It was based on my recommendation.
16 So what other conversations took place that
17 didn't include me, I don't know.

18 Q. Did you ever hear reference to other
19 conversations that occurred outside of your
20 presence?

21 A. Well, no. I mean, I don't know.
22 Corporate approved it. Corporate would have
23 discussed it with legal. I don't know exactly
24 what was discussed.

25 Q. Did you think it was a serious issue